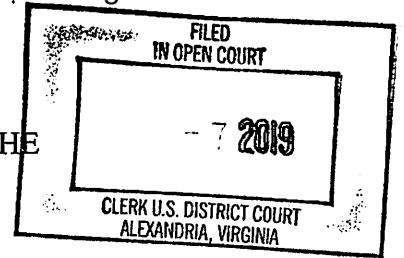


UNDER SEAL

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA



Alexandria Division

UNITED STATES OF AMERICA)	Case No. 1:19-CR-71
)	
v.)	<u>Count 1</u> : 18 U.S.C. § 922(g)(1)
)	(Felon in Possession of a Firearm)
BRIAN THOMAS REYNOLDS,)	
also known as "Tom Sanders,")	<u>Count 2</u> : 18 U.S.C. § 1001
)	(False Statements)
Defendant.)	
)	Forfeiture Notice

INDICTMENT

March 2019 Term - at Alexandria, Virginia

COUNT 1

(Felon in Possession of a Firearm)

THE GRAND JURY CHARGES THAT:

On or about June 21, 2017, at Leesburg, in the Eastern District of Virginia,

BRIAN THOMAS REYNOLDS,
also known as "Tom Sanders,"

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce firearms and ammunition, namely:

- (a) an HS Products XDS .45 cal. pistol, bearing serial number XS680272;
- (b) a Remington Model 1911 R1, .45 Cal. pistol, bearing serial number RH47968A;
- (c) a Ruger LCP .380 cal. pistol, bearing serial number 376-55390;
- (d) a FNH FNS-9, 9mm pistol, bearing serial number GKU0010164;
- (e) a Cobra ENT of Utah Inc. Model CA-380, .380 Cal. pistol, bearing serial number CP079594;

- (f) a Smith & Wesson M&P 15-22 Rifle, bearing serial number HBT2842;
- (g) a Devil Dog Arms carbine model DDA-15B, bearing serial number B00019;
- (h) a Mossberg Maverick Model 88, 12 Gauge shot gun, bearing serial number MV72623S;
- (i) rounds of .45 caliber ammunition;
- (j) rounds of .380 caliber ammunition;
- (k) rounds of 5.56x45 caliber ammunition;
- (l) rounds of 9 mm ammunition; and
- (m) rounds of .22 caliber ammunition;

all of which firearms and ammunition previously had traveled in interstate commerce.

(In violation of Title 18, United States Code, Section 922(g)(1).)

COUNT 2

(False Statements)

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 21, 2017, at Sterling, within the Eastern District of Virginia,

BRIAN THOMAS REYNOLDS,
also known as "Tom Sanders,"

defendant herein, did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, namely, falsely asserting to the FBI that, since being released from prison on a prior federal conviction, he had never shot, carried, owned, bought, or sold a firearm.

(In violation of Title 18, United States Code, Section 1001(a)(2).)

FORFEITURE NOTICE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT THE PROPERTY DESCRIBED BELOW IS SUBJECT TO FORFEITURE:

Pursuant to Federal Rule of Criminal Procedure 32.2(a), the defendant BRIAN THOMAS REYNOLDS, also known as "Tom Sanders," is hereby notified that, if convicted of an offense alleged in Count 1 of this Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearm and ammunition involved in or used in the offense.

The property to be forfeited includes, but is not limited to:

- (a) an HS Products XDS .45 cal. pistol, bearing serial number XS680272;
- (b) a Remington Model 1911 R1, .45 Cal. pistol, bearing serial number RH47968A;
- (c) a Ruger LCP .380 cal. pistol, bearing serial number 376-55390;
- (d) a FNH FNS-9, 9mm pistol, bearing serial number GKU0010164;
- (e) a Cobra ENT of Utah Inc. Model CA-380, .380 Cal. pistol, bearing serial number CP079594;
- (f) a Smith & Wesson M&P 15-22 Rifle, bearing serial number HBT2842;
- (g) a Devil Dog Arms carbine model DDA-15B, bearing serial number B00019;
- (h) a Mossberg Maverick Model 88, 12 Gauge shot gun, bearing serial number MV72623S;
- (i) rounds of .45 caliber ammunition;
- (j) rounds of .380 caliber ammunition;
- (k) rounds of 5.56x45 caliber ammunition;
- (l) rounds of 9 mm ammunition; and
- (m) rounds of .22 caliber ammunition.

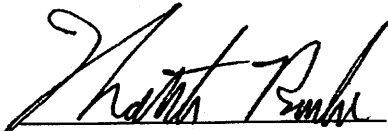
(In accordance with Title 18, United States Code, Section 924(d)(1); Title 28, United States Code, Section 2461(c); and Rule 32.2(a), Federal Rules of Criminal Procedure.)

G. Zachary Terwilliger
United States Attorney

A TRUE BILL

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

By:



Matthew Burke
Assistant United States Attorney
Russell L. Carlberg
Special Assistant United States Attorney

FOREPERSON OF THE GRAND JURY